

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

Stephanie S. Miller,

**Case No. 20-43083-tjt
Judge Thomas J. Tucker
Chapter 13**

Debtor.

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**ORDER DISAPPROVING DEBTOR'S PROPOSED POST-
CONFIRMATION PLAN MODIFICATION**

This case is before the Court on the Debtor's proposed post-confirmation plan modification, filed November 18, 2020 (Docket # 29, the "Plan Modification"). All interested parties were served with notice of the plan modification, and the only objection, filed by the Chapter 13 Trustee, has been resolved, as shown by the stipulation filed February 24, 2021 (Docket # 44).

Nonetheless, the Court must disapprove the Plan Modification, because it proposes to extend the length of the Debtor's confirmed plan to 84 months. That is not permitted, under the CARES Act or otherwise, however, because the plan in this case was confirmed on June 3, 2020, *after* the March 27, 2020 effective date of the CARES Act. *See In re Drews*, 617 B.R. 579 (Bankr. E.D. Mich. 2020).

Accordingly,

IT IS ORDERED that the Plan Modification (Docket # 29) is disapproved.

Signed on February 25, 2021



/s/ Thomas J. Tucker

**Thomas J. Tucker
United States Bankruptcy Judge**